

Exhibit N

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Yunseo CHUNG,

Plaintiff-Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States of America; Marco RUBIO, in his official capacity as Secretary of State, U.S. Department of State; Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice; Kristi NOEM, in her official capacity as Secretary of Homeland Security, U.S. Department of Homeland Security; Todd M. LYONS, in his official capacity as Acting Director, U.S. Immigration and Customs Enforcement; and William P. JOYCE, in his official capacity as Acting Field Office Director of the New York Immigration and Customs Enforcement Office,

Defendants-Respondents.

Case No. 25-cv-2412

DECLARATION OF NAZ AHMAD

I, Naz Ahmad, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of this Court, a licensed attorney in good standing in the state of New York, Co-Director of the CLEAR Project at CUNY School of Law, and counsel to Plaintiff-Petitioner Yunseo Chung in the above-captioned matter. I am personally familiar with the facts set forth in this Declaration and, if called, could testify competently thereto.
2. On Sunday, March 9, 2025, in the evening, I spoke with another attorney who has advised Ms. Chung, Nayantara Bhushan, concerning apparent attempts by members of federal law enforcement to speak with Ms. Chung.

3. Later that evening, Attorney Bhushan informed me that she had been contacted by an Assistant United States Attorney (AUSA), Perry Carbone, about Ms. Chung.
4. On Monday, March 10, 2025, I spoke to AUSA Carbone shortly after 11:00 am, with a CLEAR colleague on the line.
5. AUSA Carbone explained that the U.S. Attorney's Office for the Southern District of New York had been tasked with assisting Homeland Security Investigations with respect to Ms. Chung.
6. AUSA Carbone clarified: "We don't, at this point, believe that she will be charged with a criminal violation." This was referring to my client, Ms. Chung.
7. AUSA Carbone then stated: "As I understand it, she is out of status. Her visa has been revoked."
8. I responded that Ms. Chung does not hold a student visa, she has lawful permanent resident status.
9. AUSA Carbone replied: "I understand she has LPR and I understand the Secretary of State has revoked that."
10. I responded that the Secretary of State does not have authority to revoke lawful permanent resident status unilaterally.
11. AUSA Carbone could not explain, when asked, what rendered Ms. Chung, a lawful permanent resident, subject to deportation.
12. AUSA Carbone suggested that Ms. Chung should surrender to HSI.
13. AUSA Carbone also stated: "The government will be looking for her."
14. Later that day, AUSA Carbone sent me a digital copy of an administrative arrest warrant naming Ms. Chung, included as an Exhibit to the Declaration of Sonya Levitova.

15. At no point has AUSA Carbone or anyone else conveyed to me that there is a judicial warrant for Ms. Chung's arrest nor do I have any reason to believe there might be.

16. On Thursday, March 13, 2025, I received a copy from another client of a judicial search warrant that ICE had executed both at Ms. Chung's Columbia dorm room and at the other client's residence, ostensibly to seize documents. The warrant appears to have been issued in furtherance of an investigation targeting Columbia University under the federal harboring statute, 8 U.S.C. § 1324. No documents or other items were taken from Ms. Chung's apartment pursuant to the warrant, to my knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 24, 2025 in New York, New York.

/s/Naz Ahmad

Naz Ahmad

Attorney for Plaintiff-Petitioner